

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE**

SHILLING, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States, et al.,

Defendants.

Case No. 2:25-cv-241

**DECLARATION OF VIDEL LEINS IN
SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY INJUNCTION**

I, Videl Leins, declare as follows:

1. My name is Videl Leins. I am a plaintiff in the above-captioned action. I have actual knowledge of the matters stated in this declaration.

2. I am a 34-year-old woman, and I live in Las Vegas, NV.

3. I am Staff Sergeant in the U.S. Air Force and am currently stationed at Nellis AFB.

4. I am a member of Gender Justice League.

5. I enlisted in the U.S. Air Force in November 2008. I have been serving for more than 16 Years.

6. I chose the military as a career path for my grandfather. He held a special place in my heart. His stories in the Air Force encouraged me to follow.

7. My military occupation specialty is Electrical Systems within the Air Force. I'm currently the only Electrical Sub-AMP manager at Nellis AFB. With in this role I am responsible for an asset lifecycle management portfolio containing all Air Force-owned electrical power production and electrical systems on the installation.

8. Before my current role I held various leadership roles as the Electrical NCOIC of interior, NCOIC of FCAT and Electrical facility manager for the 694th IS Sq.

9. Throughout my career, I have held key roles in electrical infrastructure management across multiple U.S. and overseas assignments, including deployments to Iraq, Kuwait, and South Korea. My contributions have earned me multiple Air and Space Commendation medals, an Achievement Medal, and an Iraq Campaign Medal, underscoring my commitment to excellence in military engineering.

10. I am transgender. I have known for over 20 years that I am female.

11. I have taken legal steps to transition by changing my name and updating my gender marker on my Driver's license, and I am in the process of amending my birth certificate.

12. Since I came out in the military as transgender in 2023, my commander has worked with me and been supportive of my transition throughout my transition. My commander signed off on my medical transition plan, which I have started and must complete before updating my gender marker in the Defense Enrollment Eligibility Reporting System.

13. Being able to serve openly as a transgender individual has made me a stronger asset to the military. I am able to function as a productive, healthy member of the military, and I am able to forge stronger relationships with others in my unit.

14. Since the Executive Order banning my service was released, I have felt betrayed, not just by the government, but by the very institution I have dedicated my life to. Serving in the military has been more than just a career; it has been a core part of my identity, a commitment to protecting the values of this country. To be told that my service is no longer wanted, not because of my performance or dedication, but because of who I am, feels like a deep personal rejection of my character.

1 15. I have engaged in speech and conduct disclosing my transgender status and
2 expressing my gender identity, including by coming out to my chain of command and my fellow
3 service members, taking steps to transition, and living openly as female in military life. I want to
4 continue to be able engage in speech and conduct disclosing my transgender status and
5 expressing my gender identity.

6
7 I declare under the penalty of perjury that the foregoing is true and correct.

8
9 DATED: February 15, 2025

Videl Leins
Videl Leins (Feb 15, 2025 12:11 PST)
Videl Leins